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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Ms. J.P., et al.,

Plaintiffs,

v.

WILLIAM P. BARR, et al.,

Defendants.

Case No. 2:18-cv-06081-JAK-SK

Assigned to the Hon. John A. Kronstadt
and the Hon. Steve Kim

**JOINT REPORT PER COURT'S
NOVEMBER 6, 2019 ORDER**

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26 *** Institution listed for identification purposes only*

1 Pursuant to the Court's Order dated November 6, 2019 (ECF No. 253), the parties
2 met and conferred on November 14, 2019, and have agreed to a revised pre-trial
3 schedule as set forth in the attached completed Exhibit A.

4 Defendants position: Defendants were prepared to submit to the Court an updated Rule
5 26(f) report that reflected the current posture of the case and addressed the discovery
6 issues that the parties have not discussed. Defendants posit that an updated report is
7 necessary in order for discovery to proceed in an orderly manner, to properly scope
8 discovery, and would reduce the need for Court intervention regarding the open,
9 unresolved discovery issues. Defendants note that, in Plaintiffs' First Set of Requests
10 for Production of Documents, Plaintiffs seek production of information manifestly not
11 relevant to claims or defenses in this litigation. Plaintiffs rejected Defendants efforts to
12 submit an updated report and threatened to move to strike such a filing. Defendants are
13 contemplating seeking relief from the Court to file an updated report in support of the
14 discovery process. To that end, Defendants request that the Court set a Rule 16(b)
15 conference.

16 Plaintiffs' position: The parties held a Rule 16(b) conference and submitted a
17 comprehensive Joint Report pursuant to Rule 26(f) on September 10, 2018. Plaintiffs
18 do not believe a second Rule 16(b) conference or second Rule 26(f) report are necessary
19 or appropriate. Existing rules and procedures are more than adequate and sufficient to
20 address the parties' discovery disputes. Plaintiffs will bring any unresolved discovery
21 disputes to the Court's attention through those rules and procedures.

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2 DATED: November 14, 2019

SIDLEY AUSTIN LLP

3 /s/ Amy P. Lally

4 Amy P. Lally
5 Attorney for Plaintiffs

6 DATED: November 14, 2019

UNITED STATES DEPARTMENT
7 OF JUSTICE, OFFICE OF
8 IMMIGRATION LITIGATION

9 /s/ Nicole N. Murley

10 Nicole N. Murley
11 Attorneys for Defendants

12 **FILER'S ATTESTATION**

13 Pursuant to Local Rule 5-4.3.4(a)(2) of the Central District of California, I attest
14 that I have concurrence in the filing of this document.

15 By: /s/ Amy P. Lally

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2 **CERTIFICATE OF SERVICE**

3 I am employed in the County of Los Angeles, State of California. I am over the
4 age of 18 years and not a party to the within action. My business address is 1999 Avenue
5 of the Stars, 17th Floor, Los Angeles, California 90067.

6 On November 14, 2019, I served the foregoing document(s) described as
7 **JOINT REPORT PER COURT'S NOVEMBER 6, 2019 ORDER** on all interested
8 parties in this action by the method described below:

9 I electronically filed the foregoing with the Clerk of District Court using its
10 CM/ECF system, which electronically provides notice.
11

12 I declare under penalty of perjury that the foregoing is true and correct.
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14 /s/ Amy P. Lally
15 Amy P. Lally
16 Attorney for Plaintiffs
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